

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA ex rel.
CORI RIGSBY and KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE NO. 1:06cv433-LTS-RHW

STATE FARM MUTUAL INSURANCE COMPANY DEFENDANT/COUNTER-PLAINTIFF

and

FORENSIC ANALYSIS ENGINEERING CORPORATION;
HAAG ENGINEERING CO.; and ALEXIS KING

DEFENDANTS

**DEFENDANT/COUNTER-PLAINTIFF
STATE FARM FIRE AND CASUALTY COMPANY'S
SUPPLEMENTAL COMBINED EXPERT DISCLOSURE**

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court's December 22, 2009 Text Only Order, Defendant/Counter-plaintiff State Farm Fire and Casualty Company, improperly denominated in the First Amended Complaint as "State Farm Mutual Insurance Company" ("State Farm"), submits this Supplemental Combined Expert Disclosure.

State Farm anticipates calling the following expert witnesses:¹

Kurtis R. Gurley, Ph.D.
Dept. of Civil and Coastal Engineering
University of Florida
Post Office Box 116580
Gainesville, FL 32611

¹ As explained in State Farm's Combined Disclosure Regarding Mike Ferrier and Report of Mike Ferrier [277] and the Supplemental Combined Disclosure Regarding Mike Ferrier and Report of Mike Ferrier, State Farm reserves the right to offer fact, opinion, mixed fact and opinion, technical or other specialized testimony by Mr. Ferrier. State Farm does not concede that any expert designation, report or disclosure is required for Mr. Ferrier's potential testimony, either under the Rules or any Order of this Court.

Additionally, State Farm has requested additional time to file a disclosure or report from Gerald B. Waytowich due to a pending request to FEMA/NFIP relating to that agency's *Touhy* regulations. State Farm reserves the right to offer fact, opinion, mixed fact and opinion, technical or other specialized testimony by Mr. Waytowich. State Farm does not concede that any expert designation, report or disclosure is required for Mr. Waytowich's potential testimony, either under the Rules or any Order of this Court.

Dr. Gurley's report containing the information required by Fed. R. Civ. P. 26(a)(2) was attached to State Farm's April 20, 2009 Combined Expert Disclosure [275-1] and is incorporated herein. In addition, Dr. Gurley's supplement to his report is attached hereto as collective Exhibit A and is incorporated herein.

Robert G. Dean, Sc.D.
Dept. of Civil and Coastal Engineering
University of Florida
P.O. Box 116580
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Dr. Dean's report containing the information required by Fed. R. Civ. P. 26(a)(2) was attached to State Farm's April 20, 2009 Combined Expert Disclosure [275-2] and is incorporated herein. In addition, Dr. Dean's supplement to his report is attached hereto as collective Exhibit B and is incorporated herein.

Mark Watson, P.E., SECB
Jenkins Engineering, Inc.
218 S. Thomas Street
Suite 209
Tupelo, Mississippi 38803

Mr. Watson's report containing the information required by Fed. R. Civ. P. 26(a)(2) was attached to State Farm's April 20, 2009 Combined Expert Disclosure [275-3, 4, 5] and is incorporated herein. In addition, Mr. Watson's supplement to his report is attached hereto as collective Exhibit C and is incorporated herein.

Gary Dailey
Cornerstone Construction, Inc.
1720 Woodside Cr.
Tupelo, MS 38801

Mr. Dailey's report containing the information required by Fed. R. Civ. P. 26(a)(2) was attached to State Farm's April 20, 2009 Combined Expert Disclosure [275-6, 7, 8] and is incorporated herein. In addition, Mr. Dailey's supplement to his report is attached hereto as collective Exhibit D and is incorporated herein.

Robert C. McVadon, Jr.
McVadon Enterprises, Inc.
450 Bordeaux Cove
Biloxi, MS 39531

Mr. McVadon's report containing the information required by Fed. R. Civ. P. 26(a)(2) is attached hereto as collective Exhibit E and is incorporated herein.

State Farm reserves the right to call any expert witness listed, designated or called by any other Party.

This the 2nd day of March, 2010.

Respectfully submitted,
STATE FARM FIRE AND CASUALTY COMPANY

s/ Benjamin M. Watson (MSB # 100078)
Robert C. Galloway (MSB # 4388)
Jeffrey A. Walker (MSB # 6879)
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CERTIFICATE OF SERVICE

I, Benjamin M. Watson, one of the attorneys for State Farm Fire and Casualty Company, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following via the means directed by the Court's CM/ECF System:

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THIS the 2nd day of March, 2010.

s/ Benjamin M. Watson
Benjamin M. Watson (MSB # 100078)